

MARK B. HANSON, ESQ.
Second Floor, Macaranas Building
Beach Road, Garapan
PMB 738, P.O. Box 10,000
Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
Facsimile: (670) 233-5262

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,

vs.

PLAINTIFFS' RULE 26(a)(1)
DISCLOSURES

JUNG JIN CORPORATION, a CNMI corporation,
ASIA ENTERPRISES, INC., a CNMI corporation,
PARK HWA SUN, KIM HANG KWON,
KSK CORPORATION, a CNMI corporation,
and KIM KI SUNG,

Defendants.

COMES NOW, Plaintiffs LI YING HUA, LI ZHENG ZHE and XU JING JI, by and through
their attorney, pursuant to Fed. R. Civ. P. 26(a)(1) and LR 16.2CJ(d), with the following disclosures:¹

A. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION

The following individuals and entities are likely to have discoverable information that
Plaintiffs may use to support their claims in this case:

1. Plaintiffs who may be contacted through their attorney of record at the address and
phone numbers above listed;
2. Defendants;

¹ A copy of Plaintiffs' Initial Disclosures has been filed with the Court. See L.R. 16.2CJ.d.

1 3. Several other past and present employees and or associates of Defendants and their
2 business, may have information Plaintiffs may use to support their claims in this case.

3 Plaintiffs reserves the right to amend and supplement this list if additional information
4 becomes available during the course of discovery, pursuant to Fed. R. Civ. P. 26(e).

5 **B. LISTING, DESCRIPTION AND LOCATION OF DOCUMENTS, DATA**
6 **COMPILATIONS AND TANGIBLE THINGS**

- 7 1. Corporate documents for Asia Enterprises, Inc. and Jung Jin Corporation;
8 2. Tax documents for Asia Enterprises, Inc. and Jung Jin Corporation;
9 3. Bank records for Asia Enterprises, Inc. and Jung Jin Corporation;
10 4. Employment documents, including pay records, for all Plaintiffs;
11 5. Employment documents, including pay records, for other employees of Asia
12 Enterprises, Inc. and Jung Jin Corporation;
13 6. Deposition transcripts;
14 7. Deposition video and audio recordings;
15 8. Documents referred to in other documents and in depositions on file in this matter;
16 9. Digital photographs of Welcome Laundry.

17 Plaintiffs reserve the right to amend and supplement this list if additional information
18 becomes available during the course of discovery, pursuant to Fed. R. Civ. P. 26(e).

19 **C. COMPUTATION OF DAMAGES**

20 As of August 23, 2007, the unpaid judgment in this matter, with statutory interest, is
21 \$163,853.31. Defendants KSK Corporation and Kim Ki Sung are jointly and severally liable for that
22 amount, plus additional accrued interest, costs and attorney's fees.

23 **D. LIABILITY INSURANCE AGREEMENT**

24 Defendants, or any of them, may have, or may have had, various policies of insurance that
25 would cover some or all of the claims advanced by Plaintiffs in this matter. However, the existence
26 and terms of such policy or policies are unknown to Plaintiffs and, therefore, need to be identified
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1 and produced by Defendants in their initial disclosures.

2 **E. CERTIFICATION**

3 Pursuant to Fed. R. Civ. P. 26(g)(1), I hereby certify that to the best of my knowledge,
4 information, and belief, formed after reasonable inquiry, that the above disclosure is complete and
5 correct as of the date set forth below.

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7 Respectfully submitted this 9th day of November, 2007.

8 /s/ Mark B. Hanson

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MARK B. HANSON

11 Second Floor, Macaranas Building
12 Beach Road, Garapan
13 PMB 738, P.O. Box 10,000
14 Saipan, MP 96950
15 Telephone: (670) 233-8600
16 Facsimile: (670) 233-5262
17 E-mail: mark@saipanlaw.com

18 Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be deposited in the United States Post Office,
first class mail, postage prepaid, addressed to the following:

Jung Jin Corporation
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Park Hwa Sun
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Asia Enterprises Inc.
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

I further certify that the following were served with a copy of the foregoing via the Court's
electronic case filing system and via e-mail:

G. Anthony Long
Kelley M. Butcher
LAW OFFICES OF G. ANTHONY LONG
P.O. Box 504970
Saipan, Mariana Islands 96950
E-mail: gal@nmilaw.com
kmb@nmilaw.com

DATED: November 9, 2007

/s/ Mark B. Hanson

MARK B. HANSON